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Attorneys for
 CHEVRON CORPORATION

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

***In re* Application of:**

THE REPUBLIC OF ECUADOR,

Applicant,

**For the Issuance of a Subpoena for the
 Taking of a Deposition and the Production
 of Documents in a Foreign Proceeding
 Pursuant to 28 U.S.C. § 1782**

AND RELATED CASES

Case No. CV 10-80225 MISC CRB (EMC)
 [Related Case CV 10-80324 MISC CRB
 (EMC) and CV 11-80087 MISC CRB
 (EMC)]

**CHEVRON CORPORATION'S NOTICE
 OF MOTION AND MOTION TO
 INTERVENE AND RESPONSE TO THE
 REPUBLIC OF ECUADOR'S MOTION
 TO COMPEL PRODUCTION OF
 ELECTRONICALLY STORED
 DOCUMENTS**

NOTICE OF MOTION

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on June 15, 2011, at 10:30 a.m., or as soon thereafter as the matter may be heard, before Magistrate Judge Edward M. Chen, Courtroom C, 15th Floor, Federal Building, 450 Golden Gate Avenue, San Francisco, California, Chevron Corporation will and hereby do move the Court, pursuant to Rule 24(a) of the Federal Rules of Civil Procedure, to intervene in the motion to compel brought by the Republic of Ecuador against Diego Borja, to protect Chevron's and its attorneys' work product and to protect the contact information of its employees and agents.

This motion is based upon this Notice of Motion, the accompanying Motion to Intervene and Response to the Republic of Ecuador's Motion to Compel Production of Electronically Stored Documents, the meet and confer conference and emails with the parties, the Certification of David Shapiro, the Declaration of Christina Seki and exhibits thereto, the complete files and records in this and related cases, oral argument of counsel, and such other and further matters as the Court may consider in ruling on this motion.

Dated: May 11, 2011

Respectfully submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ David W. Shapiro

David W. Shapiro
Counsel for
CHEVRON CORPORATION